GRANITE CITY ILLINOIS

City of Granite City, Illinois 62040

Von Dee Cruse Mayor Robert W. Stevens

Gail Valle Treasurer Mark C. Goldenberg City Attorney Clayton Harrison Supt. of Streets

October 4, 1991

U.S.E.P.A. - Region V Brad Bradley SHS-11 230 South Dearborn Chicago, IL 60604

SUBJECT: NL/TARACORP SITE - REMEDIAL PLAN - WELL LOCATION

Dear Mr. Bradley:

Thank you for forwarding the two pages from the remedial work plan. As we discussed in our meeting on August 20, 1991, the City is concerned about groundwater and soil contamination under and around the pile. These concerns are based on the "Study of Lead Pollution in Granite City...", April 1983, and "A Land Pollution Assessment of Granite City...", September 1984. In these reports significant concentrations of lead were found in the soil and the groundwater, especially at the groundwater surface. Whereas USEPA is planning to do groundwater and geotechnical boring as part of the subject plan, the City requests that these be performed in a manner which would provide for sampling and testing for soil and groundwater lead contamination.

Whereas the subject plan provides for several borings, the marginal expense for lead testing at intervals of 1 1/2 feet feet between 10 and 20 feet of depth would be minimal. It would be most informative to take seepage groundwater grab samples at the top of the groundwater aquifer to determine what the localized contamination level is. Normal sampling is performed from a deep well with a screen located much deeper than the groundwater surface. The sampler is also purged. Both of these factors preclude an accurate measure of localized groundwater contamination.

Our concern centers around the fact that EPA requires removal of hydrocarbon contamination from the soil and groundwater from leaking underground storage tanks. If this contamination warrants removal, surely lead would likewise.

The City believes that additional testing of the area surrounding the NL/Taracorp site should be performed. This would reveal the migration guadient and extent of propagation.

The chosen locations are too few, too close to the pile, and poorly distributed. Recommended soil from geotechnical borings and proposed wells be sampled at 1 1/2 foot intervals from 10 to 20 feet deep. Also recommend that at a minimum, four additional deep well borings be made at: Cleveland and 16th Street, State and 16th Street, State and 15th Street, and on the West edge of the SLLR site. These are minimal measure suggested to optimize your proposed efforts.

We are very concerned about USEPA's lack of interest in the situation. It is USEPA's mandate by Congress to take responsibility for causing the remediation of pollution. Studies should be initiated to identify the source, extent and best remediation means for the ground and groundwater contamination.

These comments are furnished in reply to your need for comments by October 8, 1991. Should you have questions, please call. I sincerely hope that they will prompt you to reconsider the measures outlined in your work plan.

Sincerely,

Brett L. Hanke, P.E. Director of Public Works

Craig /A. Tarpoff, Chairman Citizens Advisory Committee

BLH:mja

cc: Senator Paul Simon Senator Alan Dixon Rep. Jerry Costello Mayor Von Dee Cruse Mayor John Belcoff

